

JUDGE FORREST
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

13

CV 2552

JOHN HOLT and KRISTIN CIMONETTI individually and on behalf of other persons similarly situated who were employed by ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS, or any other entities affiliated with or controlled by ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS,

Plaintiffs,

- against -

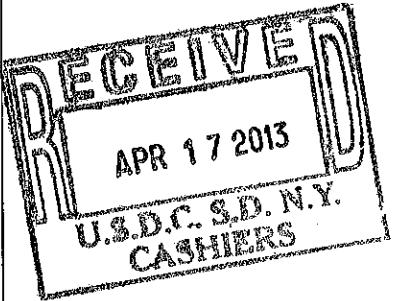
ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS, or any other entities affiliated with or controlled by ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS,

Defendants.

Plaintiffs, JOHN HOLT and KRISTIN CIMONETTI by their attorneys, Virginia & Ambinder, LLP allege upon knowledge to themselves and upon information and belief as to all other matters as follows:

PRELIMINARY STATEMENT

1. This action is brought pursuant to the Fair Labor Standards Act (hereinafter referred to as "FLSA"), 29 U.S.C. §§ 207 and 216(b), New York Labor Law Article 19 § 663, New York Labor Law Article 6 §§ 190 *et seq.*, 12 New York Codes, Rules, and Regulations (hereinafter referred to as "NYCRR") § 142-2.2, to recover unpaid wages and overtime wages owed to Plaintiffs and all similarly situated persons who are presently or were formerly employed by ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS, or any other entities



affiliated with or controlled by ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS, individually or jointly (hereinafter collectively referred to as "Animation Collective" or "Defendants").

2. For the period from approximately March 28, 2011 through June 11, 2011 (the "Relevant Period"), Animation Collective failed to provide wages, including overtime compensation, to Plaintiffs John Holt and Kristin Cimonetti, as well as others similarly situated (collectively the "Proposed Collective Members") for all hours worked.

3. Under the direction of Animation Collective's shareholders, corporate officers, and/or directors, LAURENCE S. SCHWARZ and DAVID FRANCIS, Animation Collective deliberately withheld wages and failed to compensate the Proposed Collective Members for almost three months in 2011.

4. Plaintiffs Holt and Cimonetti have initiated this action seeking for themselves, and on behalf of all similarly situated employees, all compensation, including overtime, which they were deprived of, plus interest, damages, attorneys' fees, and costs.

JURISDICTION

5. Jurisdiction of this Court is invoked pursuant to FLSA, 29 U.S.C. §216(b), and 28 U.S.C. §1331 and 1337. This court also has supplemental jurisdiction under 28 U.S.C. § 1337 of the claims brought under the New York Labor Law.

VENUE

6. Venue for this action in the Southern District of New York under 28 U.S.C. § 1331 (b) is appropriate because a substantial part of the events or omissions giving rise to the claims occurred in the Southern District of New York.

THE PARTIES

7. Plaintiff John Holt is an individual who is currently a resident of the Kings County, New York and was employed by the Animation Collective Defendants through 2012.

8. Plaintiff Kristin Cimonetti is an individual who is currently a resident of the Centereach, New York and was employed by the Animation Collective Defendants through 2011.

9. Upon information and belief, Defendant Animation Collective, Inc. is a corporation, incorporated and existing under the laws of the State of New York, with its principal place of business at 341 West 44th Street, New York, NY 10036, engaged in the entertainment business.

10. Upon information and belief, Defendant Animation Collective Holdings Corporation is a corporation, incorporated and existing under the laws of the State of New York, with its principal place of business at 341 West 44th Street, New York, NY 10036, engaged in the entertainment business.

11. Upon information and belief, Defendant Laurence Schwarz is a resident of 341 West 44th Street, New York, NY 10036, and is, and at all relevant times was, an officer, director, president, vice president, and/or owner of Animation Collective Holdings Corporation.

12. Upon information and belief, Defendant David Francis is a resident of 341 West 44th Street, New York, NY 10036, and is, and at all relevant times was, an officer, director, president, vice president, and/or owner of Animation Collective, Inc.

13. Upon information and belief, Defendant David Francis is a resident of 341 West 44th Street, New York, NY 10036, and is, and at all relevant times was, an officer, director, president, vice president, and/or owner of Animation Collective Holdings Corporation.

14. Upon information and belief, Defendant Laurence Schwarz is a resident of 341

West 44th Street, New York, NY 10036, and is, and at all relevant times was, an officer, director, president, vice president, and/or owner of Animation Collective, Inc.

15. Animation Collective engages in interstate commerce, produces goods for interstate commerce, and/or handle, sell, or work on goods or materials that have been moved in or produced for interstate commerce.

16. Upon information and belief, Animation Collective Defendants' annual gross volume of sales made or business done is not less than \$500,000.00.

ALLEGATIONS

17. Plaintiffs repeat and re-allege the allegations set forth in paragraphs 1 through 16 hereof.

18. This action is properly maintainable as a collective action pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b).

19. This action is brought on behalf of Plaintiffs and a class consisting of similarly situated employees who comprise the Proposed Collective and who worked for Animation Collective Defendants as office personnel, bookkeepers and animation technicians and were not paid wages earned during the Relevant Period.

20. Plaintiffs and other members of the Proposed Collective who have already opted-in (annexed Exhibit 1) or should choose to opt-in as part of this collective action are all victims of the Animation Collective Defendants' common policy and / or plan to violate the FLSA and NYLL by failing to provide wages, including overtime wages at the rate of one and one half times the regular rate of pay during the Relevant Period.

FACTS

21. Upon information and belief, during the Relevant Period the Animation Collective Defendants failed to pay the Potential Collective Members wages earned and owing for work performed for and on behalf of the Defendants.

22. Upon information and belief, under 29 U.S.C § 201, *et seq.*, and the cases interpreting the same, Animation Collective, Inc. and Animation Collective Holding Corporation Collective each constitute an “enterprise engaged in commerce.”

23. The payments that should have been made to Plaintiffs and other members of the Proposed Collective constitute “wages” as that term is defined under Article 6 and Article 19 of the New York Labor Law.

24. As in the case of all members of the Proposed Collective, Animation Collective Defendants did not pay any wages for work performed during the Relevant Period.

25. Upon information and belief, Defendant Laurence Schwarz was an officer, director, president, vice president, and/or owner of Animation Collective, Inc. and Animation Collective Holding Corporation, and (i) had the power to hire and fire employees for the company; (ii) supervised, controlled or oversaw employee work schedules or conditions of employment for the company; (iii) determined the rate and method of payment for Animation Collective’s employees; and (iv) maintained employment records for Animation Collective, Inc. and Animation Collective Holding Corporation.

26. Upon information and belief, Defendant Laurence Schwarz dominated the day-to-day operating decisions of Animation Collective, Inc. and Animation Collective Holding Corporation, made major personnel decisions for Animation Collective, Inc. and Animation Collective Holding Corporation, and had ultimate control of the alleged activities of Animation Collective, Inc. and Animation Collective Holding Corporation which gives rise to the claims

brought herein.

27. Upon information and belief, Defendant Laurence Schwarz was a supervisor, officer and/or agent of Animation Collective, Inc. and Animation Collective Holding Corporation, who acted directly or indirectly in the interest of these entities, and is an employer within the meaning of the Fair Labor Standards Act. Laurence Schwarz, in his capacity as an officer, director, president, vice president, and/or owner, actively participated in the unlawful method of payment for Animation Collective employees.

28. Upon information and belief, Defendant David Francis was a supervisor, officer and/or agent of Animation Collective, Inc. and Animation Collective Holding Corporation who acted directly or indirectly in the interest of these entities, and is an employer within the meaning of the Fair Labor Standards Act. Laurence Schwarz, in his capacity as an officer, director, president, vice president, and/or owner, actively participated in the unlawful method of payment for Animation Collective employees

FIRST CAUSE OF ACTION AGAINST DEFENDANTS:
FLSA MINIMUM WAGE COMPENSATION

29. Plaintiffs repeats and re-alleges the allegations set forth in paragraph 1 through 28 hereof.

30. Each Animation Collective Defendant is an employer, within the meaning contemplated under U.S.C. § 203(d).

31. Plaintiffs and other members of the Proposed Collective are employees, within the meaning contemplated, pursuant to 29 U.S.C. § 203(e).

32. Plaintiffs and other members of the Proposed Collective, during all relevant times, engaged in commerce or in the production of goods for commerce, or were employed in an

enterprise engaged in commerce or in the production of goods for commerce.

33. None of the exemptions of 29 U.S.C. § 213 applies to Plaintiffs or other similarly situated employees.

34. Upon information and belief, Defendants violated the FLSA by failing to pay Plaintiffs and other members of the Proposed Collective no less than the minimum hourly rate of wages for hours worked during the Relevant Period.

35. Upon information and belief, the failure of Defendants to pay Plaintiffs and other members of the Proposed Collective their rightfully-owed wage was willful.

36. By the foregoing reasons, Defendants are liable to Plaintiffs and members of the Proposed Collective in an amount to be determined at trial, plus liquidated damages in the amount equal to the amount of unpaid wages, interest and attorneys' fees and costs.

**SECOND CAUSE OF ACTION AGAINST DEFENDANTS:
FLSA OVERTIME COMPENSATION**

37. Plaintiffs repeat and re-allege the allegations set forth in paragraphs 1 through 37 hereof.

38. Pursuant to 29 U.S.C § 207, "no employer shall employ any of his employees who in any workweek is engaged in commerce or in the production of goods for commerce, or is employed in an enterprise engaged in commerce or in the production of goods for commerce, for a workweek longer than forty hours unless such employee receives compensation for his employment in excess of the hours above specified at a rate not less than one and one-half times the regular rate at which he is employed."

39. Each Animation Collective Defendants is defined as an employer, within the meaning contemplated, pursuant to 29 U.S.C. § 203(d).

40. Plaintiffs and other members of the Proposed Collective are employees, within the meaning contemplated, pursuant to 29 U.S.C. §203(e).

41. Plaintiffs and other members of the Proposed Collective action, during all relevant times, engaged in commerce or in the production of goods for commerce, or were employed in an enterprise engaged in commerce or in the production of goods for commerce.

42. Upon information and belief, Defendants violated the FLSA by failing to pay Plaintiffs and other members of the Proposed Collective overtime wages at a rate of one and one-half times the normal rate of pay for all hours worked over 40 in any given week during the Relevant Period.

43. Upon information and belief, the failure of Defendants to pay Plaintiffs and other members of the Proposed Collective their rightfully owed overtime wages was willful.

44. By the foregoing reasons, Defendants are liable to Plaintiffs and members of the Proposed Collective in an amount to be determined at trial, plus liquidated damages in the amount equal to the amount of unpaid wages, interest, attorneys' fees and costs.

THIRD CAUSE OF ACTION AGAINST DEFENDANTS:
NEW YORK OVERTIME COMPENSATION

45. Plaintiffs repeat and re-allege the allegations set forth in paragraphs 1 through 44 hereof.

46. Defendant is an employer, within the meaning contemplated, pursuant to New York Labor Law Article 19 § 651(6) and the supporting New York State Department of Labor Regulations.

47. Plaintiffs and other members of the Proposed Collective action are employees, within the meaning contemplated, pursuant to New York Labor Law Article 19 § 651(5) and the supporting New York State Department of Labor Regulations.

48. 12 NYCRR §142-2.2 requires that “[a]n employer shall pay an employee for overtime at a wage rate of one and one-half times the employee’s regular rate....”

49. New York Labor Law Article 19 § 663, provides that “[i]f any employee is paid by his employer less than the wage to which he is entitled under the provisions of this article, he may recover in a civil action the amount of any such underpayments, together with costs and such reasonable attorney’s fees.”

50. Upon information and belief, Plaintiffs and other members of the Proposed Collective worked more than forty hours a week while working for Defendants during the Relevant Period.

51. Upon information and belief, Plaintiffs and other members of the Proposed Collective action did not receive overtime compensation for all hours worked in excess of forty hours in any given week.

52. Consequently, by failing to pay to Plaintiffs and other members of the Proposed Collective action overtime compensation, Defendants violated New York Labor Law Article 19 § 663 and 12 NYCRR § 142-2.2.

53. Upon information and belief, Defendants’ failure to pay overtime compensation to the Plaintiffs and members of the Proposed Collective action was willful.

54. By the foregoing reasons, Defendants have violated New York Labor Law Article 19 § 663 and 12 NYCRR § 142-2.2 and are liable to Plaintiffs and members of the Proposed Collective action in an amount to be determined at trial, plus interest, attorneys’ fees, and costs.

FOURTH CAUSE OF ACTION AGAINST DEFENDANTS:
FAILURE TO PAY WAGES

55. Plaintiffs repeat and re-allege the allegations set forth in paragraphs 1 through 54 hereof.

56. Pursuant to Article Six of the New York Labor Law, workers, such as the Named Plaintiffs and other members of the Proposed Collective, are protected from wage underpayments and improper employment practices.

57. Pursuant to Labor Law § 190, the term “employee” means “any person employed for hire by an employer in any employment.”

58. As persons employed for hire by Defendants, Plaintiffs are “employees,” as understood in Labor Law § 190.

59. Pursuant to Labor Law § 190, the term “employer” includes any “person, corporation, limited liability company, or association employing any individual in any occupation, industry, trade, business or service.”

60. As entities that hired the Plaintiffs, the Animation Collective Defendants are “employers.”

61. Plaintiffs’ agreed upon wage rate and/or overtime compensation rate was within the meaning of New York Labor Law §§ 190, 191.

62. Pursuant to Labor Law § 191 workers such as the Named Plaintiffs and other members of the Proposed Collective are entitled to be paid all their weekly wages “not later than seven calendar days after the end of the week in which the wages are earned.”

63. In failing to pay the Named Plaintiffs and other members of the Proposed Collective wages, and overtime payments for time worked after forty hours in one week, Defendants violated Labor Law § 191.

64. Pursuant to Labor Law § 193, “No employer shall make any deduction from the wages of an employee,” such as the Named Plaintiffs and other members of the Proposed Collective , that is not otherwise authorized by law or by the employee.

65. By withholding wages, and overtime compensation from the Named Plaintiffs and

other members of the Proposed Collective , pursuant to New York Labor law § 193 Defendants made unlawful deductions in wages owed to the Named Plaintiffs and other members of the Proposed Collective .

66. Upon information and belief, Defendant's failure to pay the Named Plaintiffs and other members of the Proposed Collective wages and overtime compensation was willful.

67. By the foregoing reasons, Defendant has violated New York Labor Law § 198 and are liable to the Named Plaintiffs and other members of the Proposed Collective in an amount to be determined at trial, interest, attorneys' fees and costs.

WHEREFORE, Plaintiffs, individually and on behalf of all other persons similarly situated who were employed by ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS, or any other entities affiliated with or controlled by ANIMATION COLLECTIVE, INC., ANIMATION COLLECTIVE HOLDINGS CORPORATION, LAURENCE S. SCHWARZ and DAVID FRANCIS, demand judgment:

(1) on their first cause of action, against Defendants in an amount to be determined at trial, plus liquidated damages in the amount equal to the amount of unpaid wages, interest, attorneys' fees and costs,

(2) on their second cause of action against Defendants in an amount to be determined at trial, plus liquidated damages, interest, attorneys' fees and costs;

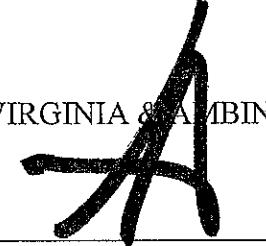
(3) on their third cause of action against Defendants in an amount to be determined at trial, plus liquidated damages, interest, attorneys' fees and costs;

(4) on their fourth cause of action against Defendants in an amount to be determined at trial, plus liquidated damages, interest, attorneys' fees and costs; and

(5) whatever other and further relief the Court may deem appropriate.

Dated: New York, New York
April 16, 2013

VIRGINIA & AMBINDER, LLP

By: 

Lloyd Ambinder
111 Broadway, Suite 1403
New York, New York 10006
Tel: (212) 943-9080
Fax: (212) 943-9082

EXHIBIT “1”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

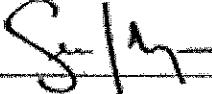
ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, Sean Lahey (Print Name), consent

to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: 

Print Name: Sean Lahey

Address: [REDACTED]

Zip Code: [REDACTED] Apt. [REDACTED]

Phone Number: ([REDACTED]) [REDACTED]

E-mail: [REDACTED] @ [REDACTED]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, Phillip Andrews (Print Name), consent
to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent
me in this action.

Signature: Phillip Andrews

Print Name: Phillip Andrews

Address: [REDACTED]

Zip Code: [REDACTED]

Phone Number: [REDACTED]

E-mail: [REDACTED] .com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

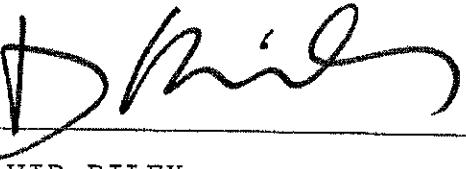
IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, DAVID RILEY (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: 

Print Name: DAVID RILEY

Address: [REDACTED]

Zip Code: [REDACTED] Apt. [REDACTED]

Phone Number: ([REDACTED]) [REDACTED]

E-mail: [REDACTED]@[REDACTED]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

-----X
CONSENT TO JOIN LAWSUIT

By signing below I, Christine Fellmeth (Print Name), consent
to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent
me in this action.

Signature: Christine Fellmeth

Print Name: Christine Fellmeth

Address: _____

Zip Code: _____

Phone Number: _____

E-mail: _____ @ _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

By signing below I, Brian Jones, (Print Name), consent
to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent
me in this action.

Signature: Brian Jones

Print Name: Brian Jones

Address: [REDACTED]

Zip Code: _____ Apt. _____

Phone Number: [REDACTED]

E-mail: [REDACTED] (D)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

By signing below I, Blake Gingerich (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Bill Gil

Print Name: Blake Gingerich

Address: _____

Zip Code: _____ Apt. _____

Phone Number: _____

E-mail: _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

By signing below I, Philip Bassis _____ (Print Name), consent
to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent
me in this action.

Signature: 

Print Name: Philip Bassis

Address: [REDACTED]

Zip Code: [REDACTED]

Phone Number: ([REDACTED]) [REDACTED]

E-mail: [REDACTED] @ [REDACTED]

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, Amy Ackerman (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Amy Ackerman

Print Name: Amy Ackerman

Address: [REDACTED], MA

Zip Code: [REDACTED] Apt. [REDACTED]

Phone Number: [REDACTED]

E-mail: [REDACTED].com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

By signing below I, ALEXANDRA ANDREW (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Alexandra Andrew

Print Name: ALEXANDRA ANDREW

Address: [REDACTED]

Zip Code: [REDACTED] Apt. _____

Phone Number: [REDACTED]

E-mail: [REDACTED]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

-----X

By signing below I, Keith Vincent (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Keith A. Vincent

Print Name: Keith Vincent

Address: [REDACTED]

Zip Code: [REDACTED]

Phone Number: [REDACTED]

E-mail: [REDACTED].com @ [REDACTED]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, John Holt (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: John Holt

Print Name: John Holt

Address: [REDACTED]

Zip Code: [REDACTED]

Phone Number: [REDACTED]

E-mail: [REDACTED] @ [REDACTED].com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, Henry R. Hilaire Jr (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Henry Robert Hilaire Jr

Print Name: Henry R. Hilaire Jr

Address: [REDACTED] NY

Zip Code: [REDACTED] Apt. [REDACTED]

Phone Number: [REDACTED]

E-mail: [REDACTED] @ [REDACTED]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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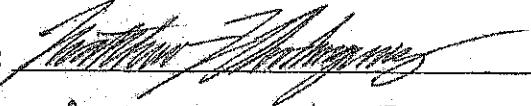
IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, MATTHEW L. RODRIGUEZ (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: 

Print Name: MATTHEW L. RODRIGUEZ

Address: [REDACTED]

Zip Code: [REDACTED] Apt. [REDACTED]

Phone Number: [REDACTED]

E-mail: [REDACTED] @ [REDACTED]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

By signing below I, Mary Varn (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Mary Varn

Print Name: Mary Varn

Address: _____

Zip Code: _____ Apt. _____

Phone Number: (____) _____

E-mail: _____ @ _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

-----X

By signing below I, Nicole Foley (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Nicole Foley

Print Name: Nicole Foley

Address: [REDACTED]

Zip Code: [REDACTED] Apt. [REDACTED]

Phone Number: [REDACTED]

E-mail: [REDACTED] @ [REDACTED].com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

By signing below I, Dana Wulfekotte (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: 

Print Name: Dana Wulfekotte

Address: 

Zip Code: 

Phone Number: 

E-mail:  @ 

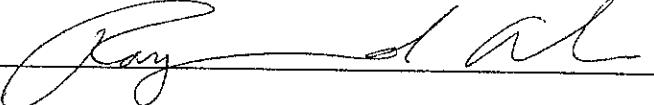
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

-----X
CONSENT TO JOIN LAWSUIT

By signing below I, RAYMOND ALMA (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: 

Print Name: RAYMOND ALMA

Address: 

Zip Code:  Apt. 

Phone Number: 

E-mail:  .com

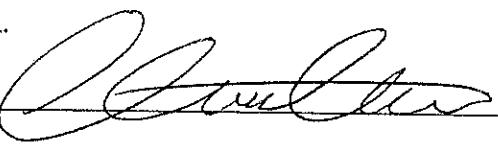
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

-----X
CONSENT TO JOIN LAWSUIT

By signing below I, Christine Kwon (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: 

Print Name: Christine Kwon

Address: 

Zip Code:  Apt. 

Phone Number: 

E-mail:  .com @ 

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

-----X

By signing below I, Kristin Cimonetti (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Kristin Cimonetti

Print Name: Kristin Cimonetti

Address: [REDACTED]

Zip Code: [REDACTED] Apt. _____

Phone Number: [REDACTED]

E-mail: [REDACTED] @ [REDACTED]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

ANIMATION COLLECTIVE, INC. et al
FAIR LABOR STANDARDS ACT
COLLECTIVE ACTION

CONSENT TO JOIN LAWSUIT

X

X

By signing below I, Frederic Udell (Print Name), consent to participate in this lawsuit. I hereby designate the law firm of Virginia & Ambinder to represent me in this action.

Signature: Frederic Udell

Print Name: Frederic Udell

Address: [REDACTED]

Zip Code: [REDACTED] Apt. [REDACTED]

Phone Number: ([REDACTED]) [REDACTED]

E-mail: [REDACTED] @ [REDACTED]. [REDACTED]